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Attorneys for Defendant  
DAVID EDLIN

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

OAKLAND

JANET HALEY,

Plaintiff,

v.

COHEN & STEERS CAPITAL  
MANAGEMENT, INC., A New York  
Corporation Doing Business in California; and  
DAVID EDLIN, an individual,

Defendants.

) Case No. C10-03856-PJH

) **STIPULATION AND ORDER**  
) **REGARDING DEFENDANT COHEN &**  
) **STEERS' ADDITIONAL WRITTEN**  
) **INTERROGATORIES TO PLAINTIFF**  
) **JANET HALEY**

1 Plaintiff Janet Haley ("Haley") and Defendants Cohen & Steers Capital Management,  
 2 Inc. ("Cohen & Steers") and David Edlin ("Edlin") (collectively, "Defendants") (collectively,  
 3 "the Parties"), by and through their respective counsel, hereby stipulate as follows:

4 WHEREAS, Defendant Cohen & Steers issued twenty-five (25) written interrogatories to  
 5 Plaintiff Janet Haley, the maximum permitted without an agreement among the parties or court  
 6 order under Federal Rule of Civil Procedure 33, before Plaintiff disclosed her employment with  
 7 Advisors Asset Management, Inc. The Parties acknowledge there is good cause for Defendant  
 8 Cohen & Steers to issue additional written interrogatories to Plaintiff regarding her employment.

9 IT IS HEREBY STIPULATED AND AGREED by and among the Parties, through their  
 10 respective undersigned counsel, that Defendant Cohen & Steers shall be permitted to issue six  
 11 (6) additional written interrogatories to Plaintiff Janet Haley regarding her employment with  
 12 Advisors Asset Management., Inc. The Parties further agree that Defendant Cohen & Steers will  
 13 not subpoena Plaintiff's employment records from Advisors Asset Management, Inc. provided  
 14 that she provides full and complete responses to its interrogatories. The Parties further agree that  
 15 should Defendant Cohen & Steers contend that Plaintiff has not provided full and complete  
 16 responses to its interrogatories, Defendant Cohen & Steers will meet and confer with Plaintiff  
 17 before issuing a subpoena for Plaintiff's employment records from Advisors Asset Management,  
 18 Inc.

19 IT IS SO STIPULATED.

20 DATED: November 17, 2011

SEYFARTH SHAW LLP

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 22  
 23 By /S/ Andrea N. de Koning  
 24 Andrea N. de Koning  
 25 Attorneys for Defendant  
 26 COHEN & STEERS CAPITAL  
 27 MANAGEMENT, INC.  
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1 DATED: November 17, 2011

SHEA LAW OFFICES

2  
3 By /S/ Mary Shea Hagebols  
Mary Shea Hagebols  
4 Attorney for Plaintiff Janet Haley

5 DATED: November 17, 2011

VAN DE POEL LEVY & ALLEN LLP

6  
7 By /S/ Jeffrey William Allen  
Jeffrey William Allen  
8 Attorneys for Plaintiff Janet Haley

9 DATED: November 17, 2011

AKIN GUMP STRAUSS HAUER & FELD  
LLP

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11  
12 By /S/ Catherine A. Conway  
Catherine A. Conway  
13 Attorneys for Defendant David Edlin

14  
15 **ORDER**

16  
17 It is hereby ORDERED that Defendant Cohen & Steers shall be permitted to issue six (6)  
18 additional written interrogatories to Plaintiff Janet Haley regarding her employment with  
19 Advisors Asset Management., Inc., pursuant to Rule 33 of the Federal Rules of Civil Procedure  
20 and the terms of the above stipulation.

21 IT IS SO ORDERED.

22  
23 DATED: 11/23/11



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